IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
	§	
PARAGON GLOBAL, LLC,	§	CASE NO. 17-36605-H1-11
PARAGON FABRICATORS, INC.	§	CASE NO. 17-36607-H1-11
PARAGON FIELD SERVICES, INC.	§	CASE NO. 17-36608-H1-11
PATEL PROPERTY HOLDINGS, LLC	§	CASE NO. 17-36610-H1-11
Debtors	§	
	§	CHAPTER 11
	§	JOINTLY ADMINISTERED
	§	Under Case No. 17-36605-H1-11

EMERGENCY MOTION OF NEWTEK SMALL BUSINESS FINANCE, LLC TO CONVERT CHAPTER 11 CASES TO CASES UNDER CHAPTER 7 PURSUANT TO 11 U.S.C. §1112(b)

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, NEWTEK SMALL BUSINESS FINANCE, LLC ("Newtek"), a secured creditor and party in interest, and files this Emergency Motion to Convert Chapter 11 Cases to Cases Under Chapter 7 (the "Motion") and would respectfully show the Court as follows:

- 1. This Motion is brought pursuant to 11 U.S.C. §1112(b)(1), and complies with Local Rule 9013-1.
- 2. As of the date of the filing of the Debtors' petitions for relief, Debtor PATEL PROPERTY HOLDINGS, LLC ("Debtor Patel Holdings"), Debtor PARAGON FABRICATORS, INCORPORATED ("Debtor Paragon Fabricators"), Debtor PARAGON FIELD SERVICES, INC. ("Debtor Paragon Services"), and PARAGON GLOBAL, LLC ("Debtor Paragon Global")(hereinafter, collectively "Debtors") were indebted to Newtek, jointly and severally, in the amount \$4,224,765.85.
- 3. On January 25, 2018, this Court entered an order for joint administration of the Debtors' cases; however, they have not been substantively consolidated. [Case 17-36608; Doc. #11]
 - 4. Debtor Paragon Global is a holding company and has no business operations.
- 5. Debtor Patel Holdings is wholly owned by Debtor Paragon Global and is a single asset real estate entity. 11 U.S.C. §101(51B).
- 6. Debtor Paragon Fabricators is wholly owned by Debtor Paragon Global and is engaged in the business of fabricating steel pressurized vessels and tanks.
- 7. Debtor Paragon Field Services is wholly owned by Debtor Paragon Global and is engaged in the business of providing civil and mechanical contractor services in the petro-chemical industry.
- 8. Newtek holds a perfected, first-priority security interest in real property owned by Debtor Patel Holdings commonly known as 412 and 500 Main Street, La Marque, Galveston County, Texas (the "Mortgaged Property").
 - 9. Newtek holds an Assignment of Leases and Rents in the Mortgaged Property.

- 10. Debtor Paragon Fabricators and Debtor Paragon Services both conduct business from the Mortgaged Property.
- 11. Newtek holds a perfected, first-priority security interest in all personal property owned by Debtor Patel Holdings, Debtor Paragon Fabricators, Debtor Paragon Services, and Debtor Paragon Global.
- 12. Newtek perfected its first-priority security interest in all personal property owned by Debtor Patel Holdings, Debtor Paragon Fabricators, Debtor Paragon Services and Debtor Paragon Global (hereinafter, collectively "Debtors") by filing a Uniform Commercial Code financing statements with the Texas Secretary of State's office.
- 13. The personal property pledged as collateral to secure the indebtedness owed to Newtek includes, but is not limited to
 - goods including raw materials, work-in-progress and finished goods . . . machinery, furniture, inventory, equipment and fixtures . . . and any and all products and proceeds of any of the foregoing, whether now existing or hereafter arising or acquired in and to any and all items of personal property, together with all attachments, accessions and equipment now or hereafter affixed thereto or used in connection therewith, all substitutions and replacements thereof and any products and proceeds thereof (the "Collateral").
- 14. On March 29, 2018, this Court entered an Order Granting Application for Authority to Employ and Pay Appraiser, Pursuant to 11 U.S.C. §327. [Doc. # 52] This order authorized Debtor's employment of McKenzie Appraisal Service ("McKenzie") to appraise Debtors' machinery and equipment. The order further provided that McKenzie was to coordinate with Newtek's own appraiser for the purpose of Newtek's own independent appraisal of its collateral.
- 15. On June 23, 2016, and prior to extending credit to Debtors, Newtek obtained a "desktop" appraisal of the equipment to be pledged as collateral to secure the indebtedness of Debtors to Newtek. Included in the appraisal were two Taylor forklifts:

(1) Taylor WPY30 forklift (30,000 lbs.) (Serial # 2758)

fair market value: \$36,200.00 orderly liquidation value: \$25,000.00 forced liquidation value: \$17,500.00

(2) Taylor TE2005 forklift (20,000 lbs.) (Serial # 18447)

fair market value: \$36,200.00 orderly liquidation value: \$25,000.00 forced liquidation value: \$17,500.00

- 16. On information and belief, McKenzie inspected the Taylor forklift trucks and gave the following expression of value for the Taylor forklifts:
 - (1) Taylor WPY30 forklift (30,000 lbs.) (Serial # 2758) fair market value: \$29,000.00
 - (2) Taylor TE2005 forklift (20,000 lbs.) (Serial # 18447) fair market value: \$25,000.00.
- 17. On May 1, 2018, Newtek's appraiser John Cronin inspected the Taylor forklift trucks and gave the following expression of value for the Taylor forklifts:
 - (1) Taylor WPY30 forklift (30,000 lbs.) (Serial # 2758) fair market value: \$20,000.00
 - (2) Taylor TE2005 forklift (20,000 lbs.) (Serial # 18447) fair market value: \$20,000.00.
- 18. On May 1, 2018, Debtors' president and managing member Surendra Patel ("Patel") gave sworn testimony in a Rule 2004 examination of Debtors. During the course of the examination, Patel testified that Debtor Fabricators' business activity had decreased and that he anticipated a voluntary conversion of Debtor Fabricators' chapter 11 case to a case under chapter 7. Further, Patel was specifically questioned about any sale of equipment -
 - Q: (by Turbyfill) . . . since you acquired Fabricators and Field Services, have - have the businesses sold any equipment?
 - A: (by Patel) No.

See, Transcript, pg. 53, lines 22-15.

- 19. On May 8, 2018, Debtor Paragon Fabricators filed Debtor's Motion for Nunc Pro Tunc Approval of Sale of Two Forklifts for Scrap Value. [Doc. #71] In this motion, Debtor Paragon Fabricators admitted that on May 4 and May 5, 2018, it sold two Taylor forklifts "for scrap value" for a sale price of \$7,000.00 each to a person and entity identified as "Nicki Wilson, Gulf Coast Surplus." The motion provides that the sale proceeds had been received by Debtor Paragon Fabricators, and that the sale proceeds would be paid to Newtek.
- 20. The sale of these forklifts was not in the ordinary course of business, and was without notice or hearing as required by Section 363(b) of the United States Bankruptcy Code (the "Code").
- 21. The forklifts are subject to the pre-petition, perfected first-priority security interest of Newtek and was without the consent of Newtek as required by Section 363(f)(2) of the Code.
- 22. On information and belief, other equipment belonging to Debtor Fabricators or Debtor Services and subject to the perfected security interest of Newtek has been sold, transferred or conveyed post-petition without consent of Newtek and without approval of this Court.
- 23. At the Rule 2004 examination, Patel was specifically questioned about the location of any of equipment -
 - Q: (by Turbyfill) . . . 500 Main Street is the building where Fabricators operates its business?
 - A: (by Patel) Yes.
 - Q: Is that where the equipment is located that you described earlier?
 - A: Yes.
 - Q: Is the equipment located in any other facility other than 500 Main Street, LaMarque, Texas?
 - A: For the Fabricators?
 - Q: Fabricators.
 - A: No.
 - Q: Okay. There is not any kind of off site location?
 - A: No.

See, Transcript, pg. 60, lines 21-25; pg. 61, lines 1-9.

24. On information and belief, other equipment belonging to Debtor Fabricators or Debtor Services and subject to the perfected security interest of Newtek may be found at the Sekisui Speciality Chemicals facility located at 1423 Pasadena Freeway Frontage Rd, Pasadena, Harris County, Texas 77506.

As a single asset real estate debtor, Debtor Patel Holdings was required, not later than March 5, 2018 to file a plan of reorganization that has a reasonable possibility of being confirmed within a reasonable time; or Debtor Patel Holdings must commence monthly payments to Newtek in an amount equal to interest at the then applicable nondefault contract rate of interest on the value of Newtek's interest in the Mortgaged Property. 11 U.S.C. §362(d)(3). Debtor Patel Holdings has failed to file a plan - or to obtain a timely extension of that deadline - and has failed to commence monthly payments to Newtek.

- 26. A bankruptcy court is afforded wide discretion in acting on a request for dismissal or conversion of a chapter 11 case. *Koerner v. Colonial Bank (In re Koerner)*, 800 F.2d 1358, 1367 (5th Cir. 1986).
- 27. Newtek believes that it is in the best interests of the creditors of the four bankruptcy estates that the chapter 11 cases be converted to cases under chapter 7 so that a trustee may be appointed to preserve the assets of the estates.
- 28. Newtek believes that cause exists for conversion of these chapter 11 cases due to (a) a substantial or continuing loss to or diminution of the estate and the absence of a reasonable likelihood of rehabilitation; (b) unauthorized sale, transfer or conveyance of property of the estate; and (c) failure or inability of Debtor Holdings to file timely a plan of reorganization or commence monthly payments to Newtek. 11 U.S.C. §1112(b)(4).

Emergency Relief Requested

- 29. By reason of the unauthorized sale of Newtek's equipment collateral, Newtek requests this Court to consider this Motion on an emergency basis to protect the property of the estates of Debtor Fabricators and Debtor Services from further sale, transfer or conveyance.
- 30. After notice and hearing, Newtek requests that this Court enter an order converting the Debtors' chapter 11 cases to cases under chapter 7.

DATED: May 10, 2018

DEVLIN, NAYLOR & TURBYFILL, P.L.L.C.

DONALD L. TURBYEUL State Bar of Texas # 20296380

dturbyfill@dntlaw.com [E-MAIL]

ATTORNEYS FOR CREDITOR

AND PARTY-IN-INTEREST

NEWTEK SMALL BUSINESS FINANCE, LLC

OF COUNSEL:

DEVLIN, NAYLOR & TURBYFILL, P.L.L.C. 5120 Woodway, Suite 9000 Houston, Texas 77056-1725 (713) 622-8338 [PHONE] (713) 586-7053 [FACSIMILE]

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2018, I served a true and correct copy of the above and foregoing EMERGENCY MOTION OF NEWTEK SMALL BUSINESS FINANCE, LLC TO CONVERT CHAPTER 11 CASES TO CASES UNDER CHAPTER 7 PURSUANT TO 11 U.S.C. §1112(b) upon the following parties by the following means:

(1) Counsel for Debtor (via ECF):

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Houston, Texas 77010
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ATTORNEY FOR DEBTORS
PARAGON GLOBAL, LLC

(2) Debtors (by regular first class mail) PARAGON GLOBAL, LLC 61 N. Plains Industrial Road, Suite 143 Wallingford, CT 06492

PARAGON FABRICATORS, INCORPORATED 500 Main Street La Marque, Texas 77568

PARAGON FIELD SERVICES, INC. 61 N. Plains Industrial Road, Suite 143 Wallingford, CT 06492

PATEL PROPERTY HOLDINGS, LLC 61 N. Plains Industrial Road, Suite 143 Wallingford, CT 06492 (3) The United States Trustee (via ECF and regular first class mail)

Office of U.S. Trustee 515 Rusk Ave., Suite 3516 Houston, Texas 77002 (713) 718-4650 [PHONE] (713) 718-4571 [FACSIMILE] UNITED STATES TRUSTEE

Christine A. March
Office of the US Trustee
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Christine.A.March@usdoj.gov [E-MAIL]

- (4) Parties Listed in Attached Debtors' Mailing Matrix (by regular first class mail)
- (5) Parties Requesting Service (via ECF)

DONALD L. TURBY/LL

Label Matrix for local noticing 17-3660 0541-4
Case 17-36605
Southern District of Texas
Houston
Thu May 10 13:53:07 CDT 2018

Galveston County
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c/o John P. Dillman
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NEWTEK SMALL BUSINESS FINANCE LLC 1981 Marcus Avenue Suite 130 Lake Success, NY 11042-1046

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H.M. Nipp, Sr.
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James M. Saulsberry/H. M. Nipp, Sr. 2237 Lakeway Drive Friendswood, TX 77546-6179

Paragon Global, LLC 500 Main Street La Marque, TX 77568-5617

Surendra Patel 500 Main Street La Marque, TX 77568-5617

US Trustee Office of the US Trustee 515 Rusk Ave Ste 3516 Houston, TX 77002-2604

Label Matrix for local noticing 17-36605 Document 74 Filed in TXSB on 05/10/18 Page 9 of 18 Everest Business Funding

c/o Jeffey Tinkham
Martin, Disiere, Jefferson & Wisdom, LLP
808 Travis Street, 20th floor
, Tx 77002-5704

Knight Capital Funding, LLC c/o Jarrod B. Martin Nathan Sommers Jacobs 2800 Post Oak Boulevard 61st Floor Houston, TX 77056-6131

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Patel Property Holdings, LLC 61 N. Plains Industrial Road, Suite 143 Wallingford, CT 06492-5841

Everest Business Funding Pryor & Mandelup, LLP Attn: Anthony F. Giuliano, Esq. 675 Old Country Road Westbury, NY 11590-4513

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Paragon Field Services, Inc. 500 Main Street La Marque, TX 77568-5617

Steel Associates, Inc. 501 S. Main St. Galena Park, TX 77547-3519

Texas Flange & Fitting Supply, Inc. c/o Greta Tucker PO Box 2889 Pearland, TX 77588-2889

Case 17-36605 Document 74 Filed in TXSB on 05/10/18 Page 10 of 18

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Bypassed recipients

Total

5

33

(u) Ally Financial Inc.

(u) Americaredit Financial Services, Inc. d/b/a

(u) McKenzie Appraisal Service

(d) Newtek Small Business Finance

(d) Paragon Fabricators, Incorporated

End of Label Matrix

1981 Marcus Avenue, Suite 130

500 Main Street

Mailable recipients

28

La Marque, TX 77568-5617

Lake Success, NY 11042-1046

Label Matrix for local noticing 17-36605 Document 74 Filed in TXSB on 05/10/18 Page 11 of 18 American Financial Services, Inc. dba CM F Case 17-36607 Southern District of Texas Houston Thu May 10 13:54:38 CDT 2018 NEWTEK SMALL BUSINESS FINANCE LLC 1981 Marcus Avenue Suite 130 Lake Success, NY 11042-1046

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A.S.M.E. 150 Clove Road, 6th Floor Little Falls, NJ 07424-2139

Ally Financial P.O. Box 380902 Bloomington, MN 55438-0902

Ameraflex Rubber & Gasket Co. 317 Georgia Avenue Deer Park, TX 77536-2505

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CGP, Inc. 8363 Market Street Road Houston, TX 77029

Campo Sheet Metal Works, Inc. 8550 Telephone Road Houston, TX 77061-4726

Crall Products 2930 TX 152 Pampa, TX 79065

Dell Computers P.O. Box 5292 Carol Stream, IL 60197-5292 c/o Pryor & Mandelup, LLP 675 Old Country Road Westbury, NY 11590-4503

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American Express P.O. Box 650448 Dallas, TX 75265-0448

BOB HERBERT & ASSOCIATES, INC. 2213 ALDINE BENDER HOUSTON, TX 77032-3123

CIT 21146 Network Place Chicago, IL 60673-1211

Chase Card Services P.O. Box 94014 Palatine, IL 60094-4014

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Galveston County, et al 722 Moody

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H.M. Nipp, Sr. PO Box 266 Seadrift, TX 77983-0266

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Joseph T. Ryerson & Son, Inc. P.O. Box 731036 Dallas, TX 75373-1036

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LEAF Capital Funding, LLC c/o Christopher V. Arisco Padfield & Stout, LLP 421 W. Third Street, Suite 910 Fort Worth, TX 76102-3751

Leaf Capital Funding 2005 Market Street, 14th Floor Philadelphia, PA 19103-7009

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Patel Property Holdings, LLC 500 Main Street La Marque, TX 77568-5617

Patel Property Holdings, Case 17-36605 Document 74 Filed in TXSB on 05/10/18 Page 13 of 18 Company 61 North Plains Industrial Road, Suite 1 Wallingford, CT 06492-5841

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Surendra Patel 500 Main Street La Marque, TX 77568-5617 Terminix Commercial P.O. Box 742592 Cincinnati, OH 45274-2592

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Texas Workforce Commission P.O. Box 149037 Austin, TX 78714-9037

Texas Workforce Commission Regulatory Integrity Division - SAU Room 556 101 E. 15th Street

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Austin, TX 78778-0001

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Uniform Components 10703 Sheldon Road Houston, TX 77044-6003

WB Mason Co., Inc. 59 Centre Street Brockton, MA 02301-4075

Wingo Service Co., Inc. 11173 Cox Road Conroe, TX 77385-7319

Margaret Maxwell McClure Attorney at Law 909 Fannin Suite 3810 Houston, TX 77010-1030

> The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Americredit Financial Services, Inc. dba GM Financial PO Box 183853 Arlington, TX 76096

Dell Business Credit P.O. Box 5275 Carol Stream, IL 60197

Sprint P.O. Box 4181 Carol Stream, IL 60197

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(d) Bob Herbert & Associates(d) Paragon Fabricators, Incorporated2213 Aldine Bender500 Main StreetHouston, TX 77032-3123La Marque, TX 77568-5617

End of Label Matrix
Mailable recipients 81
Bypassed recipients 2
Total 83

Label Matrix for local noticing 17-36605 Document 74 Filed in TXSB on 05/10/18 Page 15 of 18 NEWTER SMALL BUSINESS FINANCE LLC c/o Jarrod B. Martin 1981 Marcus Avenue Suite 130 Case 17-36608 Nathan Sommers Jacobs Lake Success, NY 11042-1046 Southern District of Texas 2800 Post Oak Boulevard Houston 61st Floor Thu May 10 13:55:50 CDT 2018 Houston, TX 77056-6131 Paragon Field Services, Inc. Texas Workforce Commission 61 N. Plains Industrial Road, Suite 143 Jason Starks United States Bankruptcy Court Wallingford, CT 06492-5841 c/o Sherri K. Simpson, Paralegal PO Box 61010 Houston, TX 77208-1010 P.O. Box 12548 Austin, TX 78711-2548 American Express American Express Travel Related Services Com Anderson Law Group P.O. Box 650448 13577 Feather Sound Drive, Suite 500 Dallas, TX 75265-0448 c/o Becket and Lee LLP Clearwater, FL 33762-5550 PO Box 3001 Malvern PA 19355-0701 BBB Tank Services, Inc. BBB Tank Services, LLC Brazosport Safety Council P.O. Box 3140, Dept. 255 c/o Joe Virene P.O. Drawer 2650 Houston, TX 77253-3140 Gray Reed & McGraw LLP Freeport, TX 77542-2650 1300 Post Oak Blvd., Suite 2000 Houston, Texas 77056-8000 CMC Construction Services Capital One Galveston County, et al P.O. Box 844573 P.O. Box 650007 722 Moody Dallas, TX 75284-4573 Dallas, TX 75265-0007 Galveston, TX 77550-2317 H. M. Nipp, Sr./James M. Saulsberry H. M. Nipp, Sr./James M. Saulsberry H.M. Nipp, Sr. P.O. Box 266 PO Box 266 1728 Hawthorne La Marque, TX 77568-5812 Seadrift, TX 77983-0266 Seadrift, TX 77983-0266 Harrom M. Nipp, Sr. Harrom M. Nipp, Sr. (E. Lamm, III) Holes Incorporated P.O. Box 266 3730 Kirby Drive, Suite 650 9911 Franklin Road Seadrift, TX 77983-0266 Houston, TX 77070-4199 Houston, TX 77098-3930 Humana Health Plan - Texas Industrial Solutions, Inc. Internal Revenue Service P.O. Box 3226 6022 Sycamore Avenue P.O. Box 7346 Milwaukee, WI 53201-3226 Pasadena, TX 77503-4230 Philadelphia, PA 19101-7346 (p) INTERNAL REVENUE SERVICE Internal Revenue Service-U.S. Attorney Internal Revenue Service-US Atty Gen CENTRALIZED INSOLVENCY OPERATIONS 1000 Louisiana Street, Suite 2300 10th & Constitution, N.W. PO BOX 7346 Houston, TX 77002-5010 Washington, DC 20530-0001 PHILADELPHIA PA 19101-7346

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James M. Saulsberry/H. M. Nipp, Sr. 26605 Document 74 Filed in TXSB on 05/10/18 Page 16 of 18 Knight Capital Funding III, LLC 2237 Lakeway Drive Friendswood, TX 77546-6179

6402 Avenue W Texas City, TX 77590 1691 Michigan Avenue, Suite 230 Miami Beach, FL 33139-2566

Knight Capital Funding III, LLC 6915 SW 57th Avenue South Miami, Florida 33143-3654

Knight Capital Funding III, LLC 9 E. Loockerman Street, Suite 3A-543 Dover, DE 19901-8306

Knight Capital Funding III, LLC (J. Dubi 10440 N. Central Expressway, Suite 800 Dallas, TX 75231-2264

McCarthy Burgess 26000 Cannon Road Cleveland, OH 44146-1807

Newtek Small Business Finance, LLC/SBA 1981 Marcus Avenue, Suite 130 Lake Success, NY 11042-1046

Ogletree Deakins P.O. Box 89 Columbia, SC 29202-0089

Paragon Fabricators, Inc. 500 Main Street La Marque, TX 77568-5617

Paragon Field Services, Inc. 500 Main Street La Marque, TX 77568-5617

Paragon Global, LLC 500 Main Street La Marque, TX 77568-5617

Patel Property Holdings, LLC 500 Main Street La Marque, TX 77568-5617

Patel Property Holdings, LLC 61 North Plains Industrial Road, Suite 1 Wallingford, CT 06492-5841

St. Lukes Sugar Land Hospital P.O.Box 4406 Sugar Land, TX 77478

Surendra Patel 500 Main Street La Marque, TX 77568-5617 TGE Industrial Services 2510 East Beltway 8 Pasadena, TX 77503-4010 Team Industrial Services, Inc. P.O. Box 842233 Dallas, TX 75284-2233

Texas City ISD P.O. Box 1150 Texas City, TX 77592-1150

Texas Workforce Commission P.O. Box 149037 Austin, TX 78714-9037

Texas Workforce Commission Regulatory Integrity Division - SAU Room 556 101 E. 15th Street Austin, TX 78778-0001

Texas Workforce Commission (Ofc of AG) P.O. Box 12548 Austin, TX 78711-2548

Third Coast Metal Products P.O. Box 890401 Houston, TX 77289-0401

US Trustee Office of the US Trustee 515 Rusk Ave Ste 3516 Houston, TX 77002-2604

Verizon by American InfoSource LP as agent PO Box 248838 Oklahoma City, OK 73124-8838

Margaret Maxwell McClure Attorney at Law 909 Fannin Suite 3810 Houston, TX 77010-1030

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4). Internal Revenue Service-Spec Procedures

Document 74 Filed in TXSB on 05/10/18 Page 17 of 18
1919 Smith Street, Stop 5025H0U

Houston, TX 77002

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Paragon Fabricators, Incorporated 500 Main Street
La Marque, TX 77568-5617

End of Label Matrix
Mailable recipients 55
Bypassed recipients 1
Total 56

Label Matrix for local noticing 17-36605 Document 74 Filed in TXSB on 05/10/18 Page 18 of 18 NEWTEK SMALL BUSINESS FINANCE LLC 0541-4 Case 17-36610 Southern District of Texas Houston Thu May 10 13:56:19 CDT 2018

United States Bankruptcy Court PO Box 61010 Houston, TX 77208-1010

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Galveston County c/o John P. Dillman Linebarger Goggan Blair & Sampson LLP P.O. Box 3064 Houston, Tx 77253-3064

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End of Label Matrix Mailable recipients 13 Bypassed recipients 0 Total 13